



**Publish Full National List in Proposed Rule, Provide Technical Advisory Panel Reviews:
Comments of the Organic Trade Association on
“National Organic Program, Sunset Review”, Docket Number TM-04-07**

*Submitted by:
Tom Hutcheson, Associate Policy Director
August 16, 2005*

The Organic Trade Association (OTA) thanks AMS for this opportunity to comment on the Advanced Notice of Proposed Rulemaking on the sunset review.

OTA commends the National Organic Program and the National Organic Standards Board for moving this work forward in a timely way. OTA is confident that the current process is sufficient to complete the sunset review deliberately and fairly.

OTA notes that many of our members are participating in developing comments on this Advanced Notice of Proposed Rulemaking. Nonetheless, this is the first time this process has been undertaken, and OTA has noted varying degrees of understanding regarding the form and content of desirable comments.

Because of this, and in order to ensure deliberate and fair review, OTA requests that NOP publish a Proposed Rule that also lists all materials coming up for sunset review, as this Advanced Notice of Proposed Rulemaking does; that the Proposed Rule note whether comments have been received on each material; and that it note whether any comments were received opposing any material. This will allow OTA and its members to respond appropriately in a timely way before a final rule is published.

OTA further requests that as far as is practical, NOP make available, on-line if possible, the technical advisory panel (TAP) reviews for the materials in the comment. OTA understands that this is a substantial amount of work and suggests that NOP prioritize making available any TAP reviews on controversial materials.

Thank you very much for your consideration.

Headquarters: 60 Wells Street, P.O. Box 547, Greenfield, MA 01302 USA • (413) 774-7511

Fax: (413) 774-6432 • e-mail: info@ota.com • web site: www.ota.com

Legislative Office: 600 Cameron Street, Alexandria, VA 22304 USA • (202) 338-2900

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